



TransAlta Centralia Generation LLC

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October 29, 2012

Ms. Martha Hankins
Toxics Cleanup Program
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Proposed Amendments to the Sediment Management Standards

Dear Ms. Hankins:

Thank you for the opportunity to comment on the Draft changes to the Department's Sediment Management Standards (SMS). These comments are being submitted on behalf of TransAlta Centralia Generation LLC and TransAlta Centralia Mining LLC. The comments presented here are general although some specific comments are referenced by chapter or section number in the draft document.

Default Fish Consumption Rate

TransAlta supports the decision not to add a default fish consumption rate to the SMS rule. A default fish consumption rate is not appropriate to be included in the SMS rule as this rule is typically applied to unique cleanup actions.

SMS Not Part of EPA Approved WQ Standards

TransAlta believes that the revisions to the SMS should be performed under the Washington MTCA rules and not the water quality standards. We support Ecology's decision not to request these changes be approved by EPA as a Water Quality Standards rule.

Cleanup Time Frames

The proposed revisions significantly shorten the maximum restoration time frame for a cleanup. The Sediment Cleanup Advisory Committee considered and rejected the option of changing the rules from the current requirement that cleanup standards must be met within ten years following completion of cleanup, to requiring that cleanup standard must be met within ten years of initiating cleanup. The draft SMS proposal ignores the Committee's recommendation.

TransAlta suggest that the next to last sentence of 173-204-200(46) be revised to read: "...within ten years after the completion of the cleanup action." The last sentence of this subsection referring to sediment recovery zones should be deleted. Subsection 173-204-570(5)(b) should also be deleted to be consistent.

Please feel free to contact me at (360) 807-8031 or at brian_brazil@TransAlta.com if you have any questions related to these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Brazil".

Brian Brazil
Environmental Manager
TransAlta Centralia Generation